

UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND

CROSS RIVER BANK,

Plaintiff,

v.

3 BEA'S ASSISTED LIVING LLC, a  
Maryland Limited Liability Company, a/k/a  
THREE BEA'S ASSISTED LIVING,  
CONNIE STEWART, and  
DAVID STEWART JR.

Defendants.

Case No. 8:21-cv-03210-TJS

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AFFIDAVIT OF PHILLIP GOLDFEDER

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I, Phillip Goldfeder, do hereby depose and state as follows:

1. I am the SVP, Public Affairs of Cross River Bank.
2. I am familiar with the facts involved in this litigation.
3. Attached is **Exhibit 1**, a true and accurate copy of the loan application and loan documents concerning the Paycheck Protection Program loan that is the subject of this litigation.
4. Attached is **Exhibit 2**, a true and accurate copy of the Indemnification Agreement Request for Return of Funds ("Indemnification Agreement") that Cross River Bank wired to Bank of America for 3 Bea's Assisted Living, LLC account x1025 dated May 20, 2020.
5. Cross River only recovered \$4,717.53 from Bank of America in response to the above referenced Indemnification Agreement.

I hereby verify and affirm under the penalty of perjury, that the information contained in this affidavit is true and correct to the best of my knowledge, information and belief.



Sworn and Subscribed to before me  
this 7 day of November, 2022

  
Notary Public

